

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ABDIELL SUERO,

Plaintiff,

- against -

NFL, NEW YORK FOOTBALL GIANTS,
INC., NEW YORK JETS LLC, and METLIFE
STADIUM COMPANY, LLC,

Defendants.

Civil Action No. 1:22-CV-31-AJN

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, defendants the National Football League (“NFL”), New York Football Giants, Inc. (“Giants”), New York Jets LLC (“Jets”), and New Meadowlands Stadium Company, LLC (the “Stadium,” and, collectively with the NFL, Giants, and Jets, the “Defendants”), by and through their attorneys, Haynes and Boone LLP, will move before the Honorable Alison J. Nathan, at the United States District Court for the Southern District of New York, 40 Foley Square, Courtroom 906, New York, New York 10007, on a date to be determined by the Court, for an order:

1. Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Complaint in its entirety with prejudice for failing to state a claim upon which relief may be granted; and
2. Granting Defendants such other and further relief as the Court may deem just and proper.

Dated: March 21, 2022

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